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March 18, 2015

**VIA ECF FILING**

Judge Robert E. Littlefield  
United States Bankruptcy Court  
Northern District of New York  
James T. Foley Courthouse  
445 Broadway 6 Suite 300  
Albany, NY 12207

**RE: Susan Bohl v. James Orefice – Adv. Pro. No. 14-90012-1-rel**

Dear Judge Littlefield:

As you aware, the undersigned represents Susan Bohl in the above-referenced matter, in which the Defendant's motion for summary judgment is returnable before Your Honor on March 26, 2015 at 11:00 a.m. As you may also be aware, I have recently left my former law firm and have started my own practice. In that regard, Ms. Bohl has executed a consent to change attorney form authorizing me to continue to represent her in this matter. However, I have not yet been able to retrieve Ms. Bohl's file from my former office although I have made plans to pick up said file by Monday, March 23, 2015.

As a result of the foregoing, it is respectfully requested that the return date for the Defendant's motion be adjourned until April 9, 2015 with the Plaintiff's opposition papers due on or before April 2, 2015. I have spoken with Mr. Roche, the Defendant's attorney, and while he understands my predicament, he could not consent to my request. Please contact me at (330) 212-0867 with any questions or concerns. Thank you for your attention to this matter.

Very truly yours,

*William Frame*

William W. Frame, Esq.

cc: Francis Roche, Esq.